

Clerk  
District Court

NOV 28 2005

For The Northern Mariana Islands  
By \_\_\_\_\_  
(Deputy Clerk)

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Attorneys for Defendant  
Aviation Services (CNMI), Ltd. dba Freedom Air

UNITED STATES DISTRICT COURT  
FOR THE  
NORTHERN MARIANA ISLANDS

MOSES T. FEJERAN and  
QIANYAN S. FEJERAN,  
Plaintiffs,

vs.

AVIATION SERVICES (CNMI), LTD.  
dba FREEDOM AIR,  
Defendant.

CIVIL ACTION NO. 05-0033

**DEFENDANT'S LR 16.2 CASE  
MANAGEMENT STATEMENT;  
CERTIFICATE OF SERVICE**

Defendant Aviation Services (CNMI), Ltd., dba Freedom Air, submits the following Case Management Statement.

1. LR16.2CJ(e)(2):

- a. Service of process on parties not yet served. All parties have been served and have appeared.
- b. Jurisdiction and Venue. Jurisdiction and venue are proper in this Court.
- c. Anticipated Motions. Freedom Air has not yet decided if it will file any motions.

1 d. Appropriateness of special procedures such as consolidation of actions for  
2 discovery and pretrial. None appear to be needed.

3 e. Modifications of the standard pretrial procedures specified by this Rule on  
4 account of the relative simplicity or complexity of the action or proceeding. None appear to be  
5 needed.

6 f. Settlement prospects. It does not appear that an early settlement is likely.

7 g. Other matters which may be conducive to the just, efficient and  
8 economical determination of the proceedings, including the definition or limitation of issues.  
9 None.

10  
11 2. With reference to Fed.R.Civ.P 16(b), Freedom Air suggests the following  
12 deadlines:

13 a. Three months to join other parties or amend the pleadings:

14 b. Nine months to complete discovery.


15  
16 3. With reference to Fed.R.Civ.P. 16(c), Freedom Air suggests that the following  
17 may facilitate orderly progress of this action:

18 a. To avoid unnecessary proof and discovery, agreements regarding  
19 authentication of documents should be considered.

20 b. The final pretrial conference and trial should be scheduled to occur in  
21 approximately fourteen (14) months.

22  
23 DATED: Hagåtña, Guam, November 28, 2005.

24 CARLSMITH BALL LLP

25   
26 DAVID LEDGER  
27 Attorneys for Defendant  
28 Aviation Services (CNMI), Ltd.  
dba Freedom Air

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on the 28th day of November 2005, I will cause to be served, via hand delivery, a true and correct copy of **DEFENDANT'S LR 16.2 CASE MANAGEMENT STATEMENT** to the following Counsel of record.

David G. Banes, Esq.  
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Second Floor, Nauru Building  
Post Office Box 501969  
Saipan, MP 96950

DATED: Hagåtña, Guam, November 28, 2005.

  
DAVID LEDGER